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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF DEBORAH STEIN IN
SUPPORT OF FACEBOOK'S RESPONSE
TO PLAINTIFFS' DISCOVERY LETTER
REGARDING FACEBOOK'S AMENDED
RESPONSES & OBJECTIONS TO
PLAINTIFFS FOURTH SET OF
INTERROGATORIES**

I, Deborah Stein, hereby declare as follows:

1. I am a partner with the law firm Gibson, Dunn & Crutcher LLP, counsel of record for Facebook, Inc. (“Facebook”) in the above-captioned matter. I am a member in good standing of the State Bars of California and New York. I submit this declaration in support of Facebook’s Response to Plaintiffs’ January 22, 2021 Discovery Letter Regarding Facebook’s Amended Responses & Objections to Plaintiffs’ Fourth Set of Interrogatories. I make this declaration on my own knowledge, and I would testify to the matters stated herein under oath if called upon to do so.

2. Attached as **Exhibit A** is a true and correct copy of an excerpt of Facebook’s Responses & Objections to Plaintiffs’ Fourth Set of Interrogatories, dated August 17, 2020.

3. Attached as **Exhibit B** is a true and correct copy of an excerpt of Facebook’s June 29, 2018 letter to Chairman Greg Walden, Ranking Member Frank Pallone, Energy & Commerce Committee, and U.S. House of Representatives regarding Facebook’s Response to House Energy and Commerce Questions for the Record, which is available at <https://docs.house.gov/meetings/IF/IF00/20180411/108090/HHRG-115-IF00-Wstate-ZuckerbergM-20180411.pdf>.

* * *

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 27, 2021 in Los Angeles, California.

/s/ Deborah Stein

Deborah Stein